GIBSON DUNN

Gibson, Dunn & Crutcher LLP 1050 Connecticut Avenue, N.W. Washington, D.C. 20036-5306 Tel 202.955.8500 www.gibsondunn.com

Zia C. Oatley
Direct: +1 202.887.3755
Fax: +1 202.530.9622
ZOatley@gibsondunn.com

Client: 92810-00037

August 10, 2015

VIA U.S. MAIL AND FOIAONLINE

FOIA Officer U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW (2822T) Washington, DC 20460

Dear FOIA Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA" or the "Act"), I request copies of public records maintained by the U.S. Environmental Protection Agency ("EPA").

The Shell Puget Sound Refinery is an oil refinery located near Anacortes, Washington. Please produce any and all documents constituting, referring or relating to:

- Any notices of violation issued by EPA to the Shell Puget Sound Refinery.
- Any complaints filed by EPA relating to the Shell Puget Sound Refinery.
- Employee complaints related to the Shell Puget Sound Refinery.
- Any settlements of claims asserted by EPA related to the Shell Puget Sound Refinery.

Please search for responsive records regardless of format, medium, or physical characteristics. Where possible, please produce records electronically, in .pdf or .tif format, on a CD. We seek records of any kind, including hard copies, electronic records, audiotapes, videotapes, photographs, e-mails, or facsimiles. Our request also includes any attachments to those records.

We are willing to pay reasonable costs of fulfilling this public records request up to a maximum of \$1,000 without advance approval. If you estimate that the costs will exceed this limit, please inform me first. If you expect significant delay in responding to and fulfilling this request, please contact me with information about when I might expect the records to arrive. If you deny any part or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

GIBSON DUNN

FOIA Officer August 10, 2015 Page 2

I look forward to hearing from you within 20 working days, as required by the Act. 5 U.S.C. § 552(a)(6)(A)(i).

Sincerely,

Zia C. Oatley

ZCO/os